

Minutes



Complaints Task Group, Meeting #2

Date: January 8, 2014
 Time: 10am - 3:30pm
 Place: CASA office, 10035 108 Street, Edmonton, Alberta

In attendance:

| Name | Stakeholder group |
|-------------------------------|----------------------------------------------------------------------------------|
| Ann Baran | Southern Alberta Group for the Environment |
| Mike Bisaga | Lakeland Industrial Community Association |
| Roxane Bretzlaff | Canadian Association of Petroleum Producers (Canadian Natural Resources Limited) |
| Keith Denman | Alberta Environment and Sustainable Resource Development |
| Francisco Echegaray (AM only) | Natural Resources Conservation Board |
| Jennifer Fowler | West Fraser - Hinton Pulp |
| Barbara Hazelton (AM only) | Natural Resources Conservation Board |
| Joseph Hnatiuk | Canadian Society of Environmental Biologists |
| Carolyn Kolebaba (by phone) | Alberta Association of Municipal Districts & Counties |
| Jim Lapp | City of Edmonton, Compost Operations |
| Tanya Moskal-Hébert | Alberta Agriculture and Rural Development |
| Ludmilla Rodriguez | Alberta Health Services |
| Merry Turtiak (PM only) | Alberta Health |
| Dalene Wilkins | Alberta Energy Regulator |
| Celeste Dempster | CASA |
| Michelle Riopel | CASA |

Action Items:

| Action Items | Who | Due |
|----------------------------------------------------------------------------------------------------------------------------------------------------------|---------|-----------------|
| 1.4: Darren will look into possible presenters from the transportation sector. | Darren | Meeting #3 |
| 1.6: Celeste will ask the Odour Management Team if feedback from complainants would be useful for the broader work of the team and/or other task groups. | Celeste | 30 January 2014 |
| 2.1: Celeste will look into any relevant material from NCRB's 2008 conference in Banff. | Celeste | Meeting #3 |
| 2.2: Ann will highlight relevant sections from the BC document for the task group to read. | Ann | Meeting #3 |
| 2.3: Keith will investigate specifics around CIC staff training. | Keith | Meeting #3 |
| 2.4: Celeste will distribute the presentations from meeting #2. | Celeste | ASAP |
| 2.5: Celeste will look into presenters from Life in the Heartland. | Celeste | Meeting #3 |
| 2.6: Celeste will look into presenters from a dog food plant. | Celeste | Meeting #3 |
| 2.7: Celeste will contact Scott Rollans to determine his availability and rates. | Celeste | Meeting #3 |
| 2.8: Celeste will poll for dates for meeting #3. | Celeste | ASAP |

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| 2.9: Celeste will prepare the team update presentation and send to the task group for review. | Celeste | ASAP |
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1. Administrative Items

Jennifer chaired the meeting which began at 10:00am. Participants introduced themselves and were welcomed to the meeting. Quorum was achieved.

The agenda and meeting objectives were approved.

The minutes from meeting #1 were reviewed and approved with the following edits: on p.6 “small” should read “smell” and on p.7 “is published” should read “are published”. The action items from meeting #1 were updated as follows:

| Action Items | Who | Status |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|-----------------------------------------------|
| 1.1: Jim to share the Odour Wheel used to classify odours from composting. | Jim, Celeste | Complete. |
| 1.2: Celeste will consolidate List 2 and send it to the task group for review. | Celeste | Complete. |
| 1.3: Celeste will coordinate the * agencies’ presentations for meeting #2. | Celeste | Complete. |
| 1.4: Darren will look into possible presenters from the transportation sector. | Darren | In progress. Carry forward. |
| 1.5: Celeste will research if CASA has an appropriate writer on file who could compile information gathered on existing complaints processes in Alberta. | Celeste | Complete. For discussion under agenda item 4. |
| 1.6: Celeste will ask the Odour Management Team if feedback from complainants would be useful for the broader work of the team and/or other task groups. | Celeste | Carry forward. See additional info below. |
| 1.7: Celeste will research how community input was gathered by the Clean Air Strategy Project Team. | Celeste | Complete. See additional info below. |
| 1.8: Celeste will touch base with Jim Lapp about the cross-jurisdictional review. | Celeste | Complete. See additional info below. |
| 1.9: Celeste will research the last CASA Science Symposium to determine if any work was done around odour. | Celeste | Complete. See additional info below. |
| 1.10: Ann will conduct a scan of two documents to see if they contain any information relevant to task group work - RWDI Final Report Odour Management in British Columbia and Supporting Information for the Development an Odour Guideline for Saskatchewan (draft). | Ann | Complete. See additional info below. |
| 1.11: Celeste will ask the Health Task Group for advice about how medical professionals should be included in the complaints process. | Celeste | Complete. See additional info below. |
| 1.12: Celeste will poll for dates for meeting #2 in the weeks of the 6 th and 13 th of January 2014. | Celeste | Complete. |

Additional Information:

Action Item 1.6: The team will meet next on January 30th, 2014. This action item will be part of the task group’s update on their activities to the team.

Action Item 1.7: Celeste located a document summarizing how input was gathered which she will share with the task group.

Action Item 1.8: Jim noted two consultants with experience with odour management beyond the jurisdiction of Alberta. The task group will consider this information as they continue discussions around Step 2 from their workplan.

Action Item 1.9: Celeste found a presentation on odour that was delivered at the CASA Science Symposium on Nitrogen in 2006 which she will share with the task group.

Action Item 2.1: Celeste will look into any relevant material from NCRB's 2008 conference in Banff.

Action Item 1.10: Ann found that the Saskatchewan document mentioned complaints but didn't go into any great detail. The BC document was very thorough and discusses processes from various jurisdictions.

Action Item 2.2: Ann will highlight relevant sections from the BC document for the task group to read.

Action Item 1.11: The Health Task Group discussed this issue and advised that a complainant should be directed to a medical professional as soon as a symptom is reported. The Health Task Group will continue to consider this issue in greater detail as they move forward with their work.

2. CASA Update

Celeste provided an update on the Odour Management Team:

- The team will be asking each task group to present an update at the next team meeting on January 30th. The update should include: status, budget, timelines, any items where feedback from the team is required and any upcoming challenges for the task group.

Celeste also provided an update on the work of the Odour Assessment and Health Task Groups:

- Odour Assessment Task Group:
 - Met on November 26th where they prepared a draft RFP to conduct an inventory and analysis of odour assessment tools. The task group has finalized the RFP electronically and sent it to the team for final review. They are also developing a set of criteria to evaluate responses.
 - The next meeting will be February 21st to evaluate RFP responses and recommend a consultant to do the work.
- Health Task Group:
 - Met on November 3rd where they reviewed the information they had gathered about existing tools to track the health-related impacts of odour. The task group also had a preliminary discussion about topics that could be included in the backgrounder about odour and health.
 - The next meeting is scheduled for February 7th where the task group will review the findings from a second round of information gathering and continue the discussion around tool development for tracking the health-related impacts of odour.

3. Presentations

The task group heard seven presentations to gather information about current processes for handling complaints, with highlights as follows. The presenters were asked to speak to a list of questions developed by the task group in their presentations and there was also the opportunity for additional Q&A.

Natural Resources Conservation Board:

- The NRCB hotline is serviced by the CIC (see ESRD presentation). CIC staff will fill out the NRCB "Odour Report Form". This is a paper form (NB: ESRD has an online form – GoA is

hoping to make this an electronic form and is currently trying to locate a consultant to do the work). This information is entered into the NRCB database and assigned an inspector. Anyone from NRCB has access to this information at any time. The information in the database can be analyzed. The NRCB has been working with AARD to conduct more sophisticated analyses and gather more information about complaints. The data related to a specific operation can be analyzed as part of an investigation to find ways to help reduce odour (ex. odour complaints are occurring at operation X when manure is spread during specific weather conditions, therefore it may be possible to reduce odour complaints by avoiding spreading manure during these conditions).

- NRCB will respond to the complainant within 24 hours.
- NRCB tries to investigate and resolve complaints within 10 days.
- NRCB will work to validate and inspect complaints by visiting operations and checking for permit compliance. NRCB will also call operators to check what types of activities are going on. Some issues can be resolved in this way without a site visit. The NRCB does not share the name of the complainant with the operator but depending on the nature of the complaint it may be possible for them to deduce the identity of the complainant. The NRCB works to educate both operators and complainants in order to improve neighbour relations.
- Before AOPA was enacted, minimum separation distances (MDS) were set by the municipalities. Some were stricter than Agricultural Operations Practices Act (AOPA) and some were less strict. NRCB honours the strictest legislation. Some older operations are grandfathered, however, and are not subject to the stricter MDS.
- NRCB receives most complaints in the spring and fall.
- Some operators are proactive and will share with the NRCB if they intend to undertake an activity that may result in odour.
- NRCB is not able to issue fines other than some very small administrative fines. These fines are not enough to deter negative behaviour.
- Court orders are mainly used to grant access if an operator refuses to let an NRCB investigator onto their land.
- Prosecution is used on occasion but is costly and lengthy. It is not always the most effective way to resolve an issue.
- NRCB works with other agencies as required. Alberta Health Services have been involved during the permitting process – they will visit the site to comment on how the proposed operation may impact the health of the community.

Alberta Environment and Sustainable Resource Development:

- The Coordination of Information Centre (CIC), established in 2004, operates a 24-hour call centre that services the Alberta Environment Support and Emergency Response Team, the Natural Resources Conservation Board, the Alberta Energy Regulator, Alberta Environment and Sustainable Resource Development, and Transportation Canada.
- The CIC is staffed by 10 Compliance Officers (although right now they are short-staffed at 7) with a Bachelor of Science (preferably in the fields of Chemistry or Environmental Science), plus at least 2 years of related experience (or equivalent). It takes about 18 months for a CIC Compliance Officer to be fully trained.
- In 2013 the CIC received about 10,000 calls of which 519 were related to odour. Complaints are received mostly by phone but do receive about 15 emails per year from industry who are self-reporting. The same procedures apply to an email as to a call.
- Each Officer has a light on their telephone which tells them who the incoming call is for (ex. ESRD). When a call comes in for ESRD, the Officer pulls up an online form and fills it out as they take the call, gathering as much detail about the complaint as possible. Callers are asked if

they wish to be anonymous and if they would like a call back. If a caller chooses to remain anonymous they will not receive a call back.

- While there is not a specific ESRD form for odour complaints, the caller is asked to identify the source of the odour (ex. sour gas), rate the odour from 1-10, and when they noticed the odour. This information is used to help triage the complaint. An urgent complaint (ex. A gas leak) would be referred to the Emergency Response Team. If the complaint is not an emergency, the form will be emailed to the local ESRD office or to the on-call Compliance Officer. If the complaint was referred to the on-call Compliance Officer, the must contact the CIC by phone within 15 minutes of receiving the email. The CIC is not an investigative body – rather they collect information and pass it on to the appropriate people.
- As the complaint is investigated and the inspectors collect information, they will enter it into the online form so that all the information about the complaint is in one place.
- Data are tracked through the online form and it can be sorted in a number of ways, although data is not routinely analyzed. Clusters of call are tracked informally on a white board by CIC staff.
- The CIC has an agreement with Environment Canada that they will be contacted under certain circumstances (see p.18 of the ESRD Handling Procedure). Environment Canada will link to other federal agencies as necessary.
- The CIC often receives calls not related to the agencies they service. The CIC tries to refer them to the correct agency and minimize people getting bounced around.
- The CIC would like to increase awareness of their telephone number both with the public and within the GoA. They do not currently have the resources to have staff engage in educational outreach.
- The CIC would be open to continued engagement with the task group as required, and as staff resources permit.

The task group noted the importance of the first interaction with a complainant. They also noted that it would be worthwhile to consider the role of email in registering a complaint.

Action Item 2.3: Keith will investigate specifics around CIC staff training.

After lunch, Tanya chaired the meeting.

Alberta Energy Regulator:

- AER complaint calls are received by the CIC (see ESRD presentation). The CIC triages incoming calls and all odour complaints are treated as a Level 3 Complaint (unless, for example, the caller is calling to complain about an odour from 2 weeks ago). At a Level 3, the caller will either be directly transferred to the on-call AER representative or the representative will call the complainant back within 15 minutes.
- The AER inspects all odour complaints. There are, however, specific protocols for complaints related to Three Creeks and Fort McMurray mines.
- All information related to the complaint (from the initial complaint, to investigation, to follow-up with complainant) is documented in the Field Inspection Surveillance System (FIS).
- There may be some changes going forward as AER assumes duties previously taken care of by ESRD (ex. AER will now handle seismic complaints).
- AER inspectors receive a high level of training. AER will sometimes use industry inspectors to assist with investigations in remote locations.
- Investigation timelines may vary, but usually within 24 hours.

Airshed Zones:

- Most airshed zones have a relatively informal process for handling odour complaints. They will often refer complainants to the correct agency (ex. ESRD, industry). Airshed zones do not investigate complaints. In some cases, they may supply complainants with canisters for them to conduct sampling. Many people are satisfied with this outcome and subsequently don't feel the need to register a formal complaint with the regulator.
- LICA has an "Unusual Occurrence Data Collection Sheet" where information about an odour complaint can be recorded as well as an issue resolution flow chart.
- WBEA uses an App where complainants can log odour complaints. WBEA is gathering data to gain an understanding of the types of complaints over time.

Oil and Gas:

- The complaints process for conventional heavy oil operations is informal, although there is a formal protocol for the Wood Buffalo region (Fort McMurray).
- Informal process:
 - Someone will call in with a complaint and they will be passed to an administrator or field operator (whoever is the appropriate person) and asked to explain their concern. This information will be sent to the appropriate person (such as a field operator) to investigate the complaint. Action will be taken as needed and a follow-up call will be made to the complainant.
- Wood Buffalo Protocol:
 - A complaint is received by the regulator, WBEA or other. A company can also call the ESRD hotline proactively if they perceive there to be a potential source of odour requiring attention.
 - The ESRD on-call representative will check meteorological data and air quality data and assess whether the Odour Protocol should be activated. Once the protocol is activated, ESRD identifies zone(s) to be activated, and calls industry members to activate their protocols
 - The Odour Protocol is deactivated when the issue has been resolved. All zone(s) that were activated must submit a 7-day report to ESRD. These are reviewed at the WBEA quarterly meeting.

The task group noted that most complaints are made directly to AER and ESRD. Not everyone is comfortable calling industry directly.

Hinton Pulp:

- At Hinton Pulp, complaints are referred to as public inquiries.
- Odour complaints tend to occur more frequently in the summer months due to maintenance on effluent ponds. Most odour complaints are related to the effluent treatment system rather than the pulp mill.
- Hinton Pulp has a formal process for handling complaints that is outlined in a flow chart and two procedural documents. All odour complaints are reported to ESRD within 24 hours.
- Paper copies of all odour complaints are kept on file.
- Hinton Pulp has a variety of tools in place to help manage odour and investigate complaints (ex. Ambient monitoring station downwind of the mill operated by the West Central Airshed, stack monitors, community advisory council). The mill also publishes their telephone number in the local newspaper 3-4 times annually.

Edmonton Waste Management Centre:

- The City of Edmonton has a 311 hotline where residents can call to report odour complaints. 311 forwards calls related to the Edmonton Waste Management Centre to assigned staff/consultants.

- EWMC has a variety of tools in place to manage odour and investigate complaints (ex. On-site operations check, air monitoring data, 3rd party on-site and community surveys, Odowatch system).
- If a call-back is requested during the initial 311 interaction, EWMC will do so.
- A community or on-site survey can be triggered by 2 or more calls to 311 in a 6-hour period, 1 call from ESRD to 311, or at the discretion of City Odour reps (ex. Proactive survey if certain site activities are planned).

Action Item 2.4: Celeste will distribute the presentations from meeting #2.

4. Next Steps

After hearing the presentations, the task group discussed next steps. The group discussed that the presentations from today focused on the proactive side of complaints management. The group decided that at the next meeting they would like to hear some additional presentations on the proactive side of complaints management as well as from responders. The group identified the following presentations:

- Transportation (see Action Item 1.4)
- Life in the Heartland
- Rural municipality (Carolyn)
- Environmental Public Health (Ludmilla)
- Dog food plant
- ESRD field officers (Keith)

Action Item 2.5: Celeste will look into presenters from Life in the Heartland.

Action Item 2.6: Celeste will look into presenters from a dog food plant.

Additional next steps are to:

- Have a fulsome discussion about our expectations around the background report.
- Review advice from the team regarding Action Item 1.6 and develop a proposal for engaging with complainants.

The task group also discussed the possibility of contracting writer/editor Scott Rollans to compile the background report. The group agreed to contract Scott subject to determining his availability and rates. The task group estimated that roughly 80-100 hours of work are required.

Action Item 2.7: Celeste will contact Scott Rollans to determine his availability and rates.

As per Odour Management Team protocols, once Scott's availability and rates have been determined, the team will be asked to give final approval before hiring occurs (see OMT minutes from meeting #4). The task group discussed that Scott would not attend the next meeting. Rather, after the task group has discussed expectations around the background report, a small group (about 3 plus Celeste) will meet with Scott to convey to him the requirements of the task group.

5. Budget Check-in

In addition to the costs associated with hiring a writer/editor, the task group identified that there would be a cost associated with any public engagement.

6. Meeting Wrap-up

The team reviewed the action items from today's meeting.

Next meeting:

- Meeting #3 will take place in Edmonton the first two weeks of February 2014.

Action Item 2.8: Celeste will poll for dates for meeting #3.

Objective for next meeting:

- See next steps outlined under item 4 and 5.

The task group will provide an update to the team on their activities at the next team meeting on January 30th. This will include the work that has taken place so far and next steps that are planned. Tanya volunteered to give the presentation.

Action Item 2.9: Celeste will prepare the team update presentation and send to the task group for review.

The meeting adjourned at 3:20pm.